

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Lynchburg Division

SHEA WHITEHURST,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 6:21-cv-00059-NKM
	)	
LIBERTY UNIVERSITY, INC., <i>et al.</i>	)	
	)	
	)	
Defendants.	)	

**STIPULATION OF DISMISSAL WITH PREJUDICE**

Pursuant to Rule 41(a)(1)(A)(ii), and by and through their undersigned counsel, the parties stipulate to the dismissal of Plaintiff Shea Whitehurst's Amended Complaint against Defendant Liberty University, Inc. with prejudice.

The parties further stipulate that: (i) Liberty University has produced substantial facts and evidence in support of its position in this matter, facts which Liberty University maintains are materially different from the allegations in Plaintiff's Amended Complaint; (ii) Liberty University continues to believe and maintain that its response to Plaintiff's report of sexual assault was compliant with Title IX and other applicable law; (iii) no consideration of any kind was paid by Liberty University or received by Plaintiff in connection with the dismissal of this matter; and (iv) each party shall bear its own costs and attorneys' fees.

With no further pending claims, this matter is now closed.

**SHEA WHITEHURST**

/s/ Grace Williams

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**LIBERTY UNIVERSITY, INC.,**

/s/ Harold E. Johnson

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 30, 2023, the foregoing Stipulation of Dismissal was served on all counsel of records via the court's electronic filing (ECF) system.

/s/ Grace Williams  
Grace Williams, Esq.